



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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JUN 11 '98

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REPLY TO THE ATTENTION OF

JUN 30 1998

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

SRF-5J

RE: A1,P1 Certification
Report Approval

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) final Area 1, Phase 1 (A1,P1) certification report.

The certification report has adequately addressed U.S. EPA's previous comments and describes the certification results for A1,P1. However, there are a few issues regarding tables and appendices that need minor revision.

Therefore, U.S. EPA approves the A1,P1 certification report. U.S. DOE must submit changed pages addressing the attached comments within thirty (30) days receipt of this letter.

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Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,



James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Bill Murphie, U.S. DOE-HDQ
John Bradburne, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

TECHNICAL REVIEW COMMENTS ON
"AREA 1 PHASE I CERTIFICATION REPORT, REVISION 1"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 1.2 Page #: 1-2 Line #: 5
Original Specific Comment #: 1

Comment: The text refers the reader to Appendix D for a summary of project-specific plans (PSP). However, the report contains only Appendixes A and B, and the PSPs are not discussed elsewhere in the report. Appendix D should be provided for review and listed in the table of contents.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 1.5 Page #: 1-4 Line #: 27 to 31
Original Specific Comment #: 2

Comment: The text identifies the titles of all attachments as "Certification Data Tables." The text should be revised to cite the actual titles of the attachments.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.4.1 Page #: 2-9 Line #: Not Applicable (NA)
Original Specific Comment #: 3

Comment: The text refers the reader to Table 2-5 for the standard deviation of data from nonimpacted areas. The text should be revised to cite Table 2-6 instead.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.5.1 Page #: 2-11 Line #: 3
Original Specific Comment #: 4

Comment: The text describes generation and use of sets of three random numbers. The third number of each set is called "a random number," but the following text implies that the third number is used as an index for sorting the other random numbers. The text should be revised to clarify this matter.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 4.3 Page #: 4-6 Line #: 11
Original Specific Comment #: 5

Comment: The text states that full data on the ecological area-specific contaminants of concern (ASCOC) are provided in Appendix C. However, Appendix C is not included in the report, and these data are not provided in Appendix B. Appendix C should be provided for review and listed in the table of contents.

Commenting Organization: U.S. EPA Commentor: Saric
Appendix #: A Page #: NA Line #: NA
Original Specific Comment #: 6

Comment: This appendix should be revised to include a brief introduction explaining the organization of sections, especially those designated by the various colored tabs. In addition, all data designated by the yellow tabs are also provided with the corresponding blue tabs, so the yellow tabs and their data could be deleted. Also, in many tables (particularly those designated by the red tabs), the shading of the table headings is too dark, rendering the text illegible. In future reports, this shading should be deleted.

Commenting Organization: U.S. EPA Commentor: Saric
Appendix #: A Page #: NAR-3, Red Tab Line #: NA
Original Specific Comment #: 7

Comment: In this table and in Appendix B, the radiological results for sample NAR-3-3C-R and its field duplicate have "R" flags assigned during data validation and are not used in calculations. Similar "R" flags were assigned to the arsenic and beryllium results for three samples collected from certification unit Q20. However, Tables 4-1 through 4-3 contain no discussion of "R" flags for the arsenic, beryllium, and radiological results. Section 4.0 and its tables should be revised to reflect all the data with "R" flags contained in the appendices.

Commenting Organization: U.S. EPA Commentor: Saric
Appendix #: B Page #: B-1 Line #: NA
Original Specific Comment #: 8

Comment: The text refers the reader to Appendix C for full data on the ecological ASCOC, aluminum, manganese, and molybdenum. As noted in Original Specific Comment 5, Appendix C is missing from the report and should be provided for review. In addition, many of the tables in the blue tab section of Appendix A (such as those for certification units NAR-1, O19, P17-31, PUMP-1, and Q18) include lead as an ecological ASCOC. The text should be revised to include lead as an ecological ASCOC.

Commenting Organization: U.S. EPA Commentor: Saric
Appendix #: B-1 Page #: B-1-1 Line #: NA
Original Specific Comment #: 9

Comment: This appendix should be revised to include brief introduction explaining why the data presented in Appendix B-1 were not used in the certification process. This introduction should refer the reader to Section 4.1.2 for detailed information.

Commenting Organization: U.S. EPA
Attachment #: A Page #: NA
Original Specific Comment #: 10

Commentor: Saric
Line #: NA

Comment: This figure showing the current certification status of the Fernald Environmental Management Project is useful for putting the report in context. With appropriate updating and revision, the figure should be included in future reports to communicate the progress of the environmental remediation project to all concerned.